

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

UNITED STATES OF AMERICA

\*

VS.

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CASE NO. CCB 20-015

TAMUFOR ST. MICHAEL

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**CONSENT MOTION TO AUTHORIZE TRAVEL**

The Defendant by and through his Attorney, Robert C. Bonsib, Esq. respectfully requests this Honorable Court to authorize travel in the above captioned matter and, as reasons therefore, states as follows:

1. The Defendant has been indicted in the above captioned matter on the charge of exporting firearms.
2. The Defendant has been on pre-trial release since 2019, initially under terms of electronic monitoring. In March 2020, the Court granted a consent motion to have the Defendant removed from electronic monitoring. The Defendant has been compliant with all terms and conditions of his pre-trial release.
3. The Defendant's wife resides in Nashville, Tennessee where she is employed. The Defendant is desirous of being able to visit his wife in Tennessee for the period of August 4, 2021 through August 15, 2021. The Defendant is requesting that this Honorable Court authorize the Pre-Trial Services Office to grant the Defendant permission to travel to Nashville, Tennessee on dates pre-approved by the Pre-Trial Services Office and under conditions set forth by the Pre-Trial Services Office. Should the Court grant this request, the Defendant will confirm travel dates and the location where he will be staying with the Pre-Trial Services Office prior to his

travel. The Defendant has been permitted to travel out-of-state on prior occasions in this matter and has always been compliant with his conditions of release.

4. Assistant United States Attorney, Kathleen Gavin, has authorized undersigned counsel to represent that the government does not oppose this request.

WHEREFORE it is respectfully requested that this Honorable Court grant the relief prayed.

Respectfully submitted,

*/s/ Robert C. Bonsib*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was sent via electronic filing, this 3rd day of August, 2021 to Assistant United States Attorney Kathleen Gavin, Office of the United State's Attorney for the District of Maryland.

*/s/ Robert C. Bonsib*

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ROBERT C. BONSIB

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)  
**FILED UNDER SEAL**

UNITED STATES OF AMERICA

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**ORDER**

Upon consideration of the Defendant's Consent Motion to Authorize Travel it is this

\_\_\_\_ day of \_\_\_\_\_, 2020;

ORDERED that the Pre-Trial Services Office is granted authority to permit the Defendant to travel to visit his wife in Nashville, Tennessee providing that the travel itinerary is approved in advance by Pre-Trial Services Office and the Defendant complies with any additional reporting requirements imposed by the Pre-Trial Services Office.

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JUDGE

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND